

THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

vs.

PHILLIP NARDUCCI

NO. 19-72-1

**DEFENDANT PHILLIP NARDUCCI'S MOTION
TO MODIFY CONDITIONS OF RELEASE**

Defendant, PHILLIP NARDUCCI, by his attorney, BRIAN J. MCMONAGLE, Esquire, hereby moves that this Honorable Court enter an ORDER modifying defendant's conditions of release to permit him to attend a charity event at CHICKS RESTUARANT benefitting CHILDREN'S HOSPITAL OF PHILADELPHIA on April 28. 2019, and avers as follows:

1. By the terms of defendant's pretrial release, Mr. Narducci is on house arrest with electronic monitoring with permission to leave his house only for meetings with his counsel and medical appointments.

2. On April 28, 2019, Mr. and Mrs. Narducci are sponsoring the 2nd Anniversary CHOP fundraiser for Pediatric Cancer and Community Block Party at their restaurant. Last year, Mr. Narducci organized the event which raised \$30,000 for CHOP, and for which they received a citation from City Council. Thereafter, the Narducci's were provided a tour of CHOP, and of course scheduled this year's event which they hope will far exceed the success of last years event.

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

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ORDER

AND NOW, to wit, this day of APRIL, it is hereby ORDERED AND
DECREED that defendant is permitted to attend a charity event and fundraiser at Chicks
Restaurant in Philadelphia on April 28.

THE HONORABLE TIMOTHY SAVAGE

3. For this reason, Mr. Narducci respectfully requests that he be permitted to be released from home confinement to attend this charitable event. Obviously, his location will be monitored by pretrial services and he will have a time allotment to attend and return home.

WHEREFORE, for all of the foregoing reasons, defendant Phillip Narducci respectfully requests that the Court grant the instant Motion.

Respectfully submitted,

A handwritten signature in blue ink, reading "Brian J. McMonagle", is written over a horizontal line.

BRIAN J. MCMONAGLE, ESQUIRE
MCMONAGLE, PERRI & MCHUGH, P.C.
1845 Walnut Street, 19th Floor
Philadelphia, PA 19103
(215) 981-0999 Fax 091-0977

CERTIFICATE OF SERVICE

BRIAN J. MCMONAGLE, ESQUIRE, hereby certifies that on the date set forth below a true and correct copy of the Defendant's MOTION TO MODIFY CONDITIONS OF RELEASE has been served by electronic filing upon the following individuals on this date:

Honorable Timothy J. Savage

John S. Han, Assistant United States Attorney

s/BRIAN J. MCMONAGLE
BRIAN J. MCMONAGLE, ESQUIRE
MCMONAGLE, PERRI, MCHUGH, MISCHAK & DAVIS
1845 Walnut Street, 19th floor
Philadelphia, PA 19103
(215) 981-0999 Fax 981-0977

DATED: April 24, 2019